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Attorney for Defendant
Jessie Garcia-Ochoa

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

UNITED STATES OF AMERICA,

Plaintiff,

v.

PRICE *et al.*,

Defendant.

CASE NO. CR 12CR0114-JW

**STIPULATION AND ~~PROPOSED~~
ORDER STATUS CONFERENCE**

SAN FRANCISCO VENUE

Current Court Date: June 25, 2012 10:00 AM

Proposed Court Date: Sep. 17, 2012 1:30 PM

Location: Courtroom 9, 19th Floor

The above-captioned case is currently scheduled for a status conference on June 25, 2012 at 10:00 a.m. However, both defendants are still receiving and reviewing large amounts of discovery, and require additional time for preparation. The parties have agreed to continue the status hearing to September 17, 2012 at 1:30 PM.

Accordingly, the parties now stipulate and jointly request that the status hearing currently set for March 27, 2012 be vacated, and that the Court set this matter on September 17, 2012 at 1:30 P.M. Further, the parties stipulate and jointly request that time be excluded from the Speedy

1 Trial Act calculations from June 25, 2012, through September 17, 2012 for continuity, effective
2 preparation of counsel, and preparation for trial.

3 The parties agree that the ends of justice served by granting such a continuance outweighed
4 the best interests of the public and the defendant in a speedy trial. *See* 18 U.S.C. § 3161(h)(8)(A).
5 To date, all time has been excluded under the Speedy Trial Act, Title 18, United States Code,
6 Section 3161 and seventy days therefore remain on the Speedy Trial clock.
7

8 IT IS SO STIPULATED
9

10 6/21/12

/s/

11 DATED

MELINDA HAAG
United States Attorney
Northern District of California
KEVIN BARRY
Assistant United States Attorney

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16 6/21/12

/s/

17 DATED

ERICK L. GUZMAN
Attorney for Mr. Garcia-Ochoa

18
19 6/21/12

/s/

20 DATED

FRANK BELL
Attorney for Mr. Price

~~PROPOSED~~ ORDER


For good cause shown, the motion hearing now scheduled for Monday, June 25, 2012 is vacated. The matter shall be added to the Court's calendar on Monday, September 17, 2012 at 1:30 P.M.

In addition, for the reasons stated above, the Court finds that an exclusion of time from June 25, 2012 through September 17, 2012 is warranted and that the ends of justice served by the continuance outweigh the best interests of the public and the defendant in a speedy trial. *See* 18 U.S.C. §3161(h)(8)(A). The failure to grant the requested continuance would deny defense counsel the reasonable time necessary for effective preparation, taking into account the exercise of due diligence, and would result in a miscarriage of justice. *See* 18 U.S.C. §3161(h)(8)(B)(iv).

IT IS SO ORDERED.

June 22, 2012

DATED


HON. JAMES WARE
United States District Court Chief Judge